

UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
WESTERN DIVISION

IN RE:	)	In Bankruptcy Under Chapter 11
	)	
PMG III, LLC dba CARPET ONE	)	Case No. 18-80823
FLOOR AND HOME,	)	
	)	
Debtor.	)	Judge Thomas M. Lynch

**NOTICE OF MOTION TO SELL PROPERTY FREE AND CLEAR OF LIENS  
UNDER §363 OF THE UNITED STATES BANKRUPTCY CODE**

The Debtor has filed papers with the Court to Sell Property Free and Clear of Liens under §363 of the United States Bankruptcy Code.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)

If you do not want the Court to grant the Motion and want the Court to consider your views on said Motion, then you or your attorney must:

1. File a written response to the above Motion on or before the date set for the hearing on the Motion at the U.S. Bankruptcy Court, Stanley J. Roszkowski U.S. Courthouse, 327 South Church Street, Courtroom 3100, Rockford, IL 61101; OR,
2. Attend the hearing scheduled to be held on **MAY 23, 2018 AT 10:30 A.M.** at the U.S. Bankruptcy Court, Stanley J. Roszkowski U.S. Courthouse, 327 South Church Street, Courtroom 3100, Rockford, IL 61101.

If you mail your response to the Court for filing, you must mail it early enough so that the Court will receive it on or before the date stated above. You must also mail a copy to: Attorney James E. Stevens, Barrick, Switzer, Long, Balsley & Van Evera, 6833 Stalter Drive, Rockford, IL 61108

If you file a response, attend the hearing on the Motion, scheduled to be held on **MAY 23, 2018 AT 10:30 A.M.** at the U.S. Bankruptcy Court, Stanley J. Roszkowski U.S. Courthouse, 327 South Church Street, Courtroom 3100, Rockford, IL 61101.

If you or your attorney do not take these steps, the Court may decide that you do not oppose the Motion and grant the same.

Dated: May 18, 2018

/s/ James E. Stevens  
ATTORNEY JAMES E. STEVENS  
BARRICK, SWITZER, LONG,  
BALSEY & VAN EVERA, LLP  
6833 Stalter Drive  
Rockford, IL 61108  
[jstevens@bslbv.com](mailto:jstevens@bslbv.com)

**PROOF OF SERVICE**

I, the undersigned, certify that a copy of the foregoing document was served upon:

Mr. Ricky L. Davis, Managing Broker  
Stateline Real Estate, LLC  
920 22<sup>nd</sup> Street  
Rockford, IL 61108

AND  
SEE ATTACHED SERVICE LIST

by placing a true and correct copy of said document in an envelope, each addressed as is shown above or via electronic filing.

That I sealed said envelopes and placed sufficient U.S. postage on each; that I deposited said envelopes so sealed and stamped in the United States Mail at Rockford, Illinois, at or about the hour of 5:00 o'clock P.M. on the 18<sup>th</sup> day of May, 2018, or via the Court's CM/ECF system by electronic transmission.

/s/ Debbie M. Harris

Label Matrix for local noticing  
0752-3  
Case 18-80823  
Northern District of Illinois  
Rockford  
Fri May 18 14:52:10 CDT 2018

PMG III, LLC dba CARPET ONE FLOOR AND HOME  
5952 North Second Street  
Loves Park, IL 61111-4647

U.S. Bankruptcy Court  
Western Division  
327 South Church Street  
Rockford, IL 61101-1320

Advanced Disposal  
Solid Waste Midwest, LLC-T6  
8538 Hwy. 251 S.  
Davis Junction, IL 61020-9706

All Tile, Inc.  
1201 Chase Avenue  
Elk Grove Village, IL 60007-4811

Blackhawk Bank  
2475 No. Perryville Rd.  
Rockford, IL 61107-6820

CAN Capital, Inc.  
2015 Vaughn Road  
Building 500  
Kennesaw, GA 30144-7831

CCA Global-Carpet One Floor & Home  
4301 Earth City Expressway  
Earth City, MO 63045-1334

Can Capital  
2015 Vaughn Road, Suite 500  
Kennesaw, GA 30144-7831

Comcast Spotlight  
12964 Collections Center Drive  
Chicago, IL 60693-0129

Commonwealth Edison  
P.O. Box 6111  
Carol Stream, IL 60197-6111

Frankenmuth Mutual Insurance  
c/o Receivables Management Inc.  
POB1385  
Saginaw, MI 48605

Illinois Department of Employment Security  
33 South State Street  
Chicago, Illinois 60603-2808  
Attn: Bankruptcy Unit - 10th flr.

Illinois Department of Revenue  
Attention: Richard Doden  
200 S. Wyman Street #306  
Rockford, IL 61101-1234

Internal Revenue Service  
Attention: J.M. Cole  
5100 River Road  
Schiller Park, IL 60176-1058

Internal Revenue Service  
PO Box 7346  
Philadelphia, PA 19101-7346

L.W. Mountain  
1605 Dundee Avenue  
Suite B  
Elgin, IL 60120-1678

Lonesome Oak Trading Co.  
P.O. Box 216  
Chatsworth, GA 30705-0216

Machesney Park Partners  
Attention: Mike Coyle  
250 West Beltline Road  
Madison, WI 53713-2608

RLDC  
120 W. State Street, Suite 306  
Rockford, IL 61101-1199

Rockford Register Star  
99 E. State Street  
P.O. Box 439  
Rockford, IL 61105-0439

Scott Becker  
213 West Main Street  
Genoa, IL 60135-1145

Shaw Industries, Inc.  
Financial Services Dept.  
PO Box 2128  
Dalton, GA 30722-2128

Stonewood Floors  
3409 McDougall Avenue  
Suite 203  
Everett, WA 98201-5040

Amy A Aronson  
Aronson & Walsh, P.C.  
PO Box 5907  
Vernon Hills, IL 60061-5907

James E Stevens  
Barrick, Switzer, Long, Balsley & Van Ev  
6833 Stalter Drive  
Rockford, IL 61108-2582

Patrick S Layng  
Office of the U.S. Trustee, Region 11  
780 Regent St.  
Suite 304  
Madison, WI 53715-2635

End of Label Matrix  
Mailable recipients 26  
Bypassed recipients 0  
Total 26

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WESTERN DIVISION

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	)	
PMG III, LLC dba CARPET ONE	)	Case No. 18-80823
FLOOR AND HOME,	)	
	)	
Debtor.	)	Judge Thomas M. Lynch

**MOTION TO SELL PROPERTY FREE AND CLEAR OF LIENS  
UNDER §363 OF THE UNITED STATES BANKRUPTCY CODE**

NOW COMES the Debtor, PMG III, LLC dba CARPET ONE FLOOR AND HOME, by and through its attorneys, Barrick, Switzer, Long, Balsley & Van Evera, LLP, and moves the Court to approve the sale of its property free and clear of liens under §363 of the United States Bankruptcy Code, and in support thereof, states as follows:

1. On April 13, 2018, the Debtor filed a voluntary petition for relief under Chapter 11 of the United States Bankruptcy Code.

2. Since filing for relief, the Debtor has lost all employees and has determined that there is no way for it to reorganize.

3. The Debtor is delinquent pre-petition to its landlord for rent in excess of \$30,000.00.

4. The Debtor has not and cannot pay its landlord any post-petition rent due to lack of funds.

5. The landlord has filed a Motion to Modify Automatic Stay and is set for hearing on May 23, 2018 at 10:30 a.m.

6. The Debtor has received an offer to purchase virtually all of its assets in “as is” condition from Ricky L. Davis for the sum of \$20,000.00, which inventory is attached hereto and marked as “Exhibit A”. The Debtor believes that this is the best offer it can receive for the property, and the Debtor must move all of its assets which it’s unable to do.

7. The following creditors have security interest whose priority is as follows:

Blackhawk Bank .....	\$43,000.00
RLDC .....	\$10,000.00
Can Capital.....	\$6,000.00

8. There are no costs associated with the proposed sale, and the Debtor and Blackhawk Bank believe the \$20,000.00 offer is the best alternative for the Debtor.

NOW, WHEREFORE, the Debtor, PMG III, LLC dba CARPET ONE FLOOR AND HOME, prays that the Court enter an Order approving the sale of its property free and clear of liens under §363 of the United States Bankruptcy Code to Ricky L. Davis in “as is” condition for the sum of \$20,000.00 with proceeds to be payable to Blackhawk Bank.

PMG III, LLC dba CARPET ONE FLOOR  
AND HOME, Debtor

BY: BARRICK, SWITZER, LONG, BALSLEY  
& VAN EVERA, LLP

BY: /s/ James E. Stevens  
JAMES E. STEVENS

Attorney James E. Stevens (3128256)  
BARRICK, SWITZER, LONG,  
BALSLEY & VAN EVERA, LLP  
6833 Stalter Drive  
Rockford, IL 61108  
(815) 962-6611  
[jstevens@bslbv.com](mailto:jstevens@bslbv.com)



The **ONE** store for your perfect floor.

Carpet One Inventory

1. Cutting Machine & Compressor
2. Forklift & Pole
3. Carpet Racks ( steel)
4. 1 full roll of carpet
5. 8 partial rolls of carpet
6. All carpet remnants
7. All vinyl remnants
8. Porcelan Towel bars (2 skids)
9. Misc. cartons of laminate flooring
10. Misc. cartons of wood
11. All cartons of ceramic tile
12. All cartons of decorative ceramic tile
13. 8 Desks
14. Misc. office furniture including conf. tables & Chairs
15. All marked file cabinets
16. 1 fire proof file cabinet
17. 2 computers
18. 2 printers
19. 2 copy machines
20. All usable carpet, ceramic, wood, LVP samples

"EXHIBIT A"